

1 MR. TOPEL: Tab Q, page 6.

2 MRS. DUFF: Oh, Q.

3 BY MR. COHEN:

4 Q And all I'm going to ask you about is page 21 of, of  
5 Q. I'm not going to ask you any questions about the contents  
6 of the document. What I -- tell me when you've found it.

7 A Yes.

8 Q My notes reflect that you, you testified that the  
9 witness was -- well, tell me again. Who do you understand by  
10 looking at that signature signed it as Witness?

11 A For the buyer or the seller?

12 Q For the seller.

13 A It looks like David Roever.

14 Q Now, are you familiar with Mr. Roever's signature?

15 A No, I'm not.

16 Q Have you ever seen it before?

17 A No.

18 MR. COHEN: Your Honor, there were several questions  
19 asked about Bureau Exhibit 414 for identification. I  
20 recognize it is not Glendale's exhibit, but it seems to me  
21 that --

22 JUDGE CHACHKIN: Who asked the questions?

23 MR. COHEN: Mr. Topel asked the questions yesterday.

24 JUDGE CHACHKIN: Oh, if Mr. Topel asked the  
25 questions you can go into it if it's --

1 MR. COHEN: No. I want to offer it. I don't  
2 propose to ask any questions, but I'd like to offer the  
3 exhibit. It was marked for identification.

4 JUDGE CHACHKIN: Oh, I see. Well, let's --

5 MR. COHEN: I know it's not my exhibit.

6 JUDGE CHACHKIN: Well, let's see. Maybe the Bureau  
7 intends to offer it.

8 MR. COHEN: If the Bureau intends to offer it, then  
9 I certainly would defer to the Bureau.

10 JUDGE CHACHKIN: Or maybe the Bureau intends to  
11 offer it through a different witness.

12 MR. SCHONMAN: That was our intention, Your Honor.

13 MR. COHEN: Very well. I have no further questions.

14 JUDGE CHACHKIN: Does the Bureau had any recross?

15 MR. SCHONMAN: Yes, sir, just a few.

16 RECROSS-EXAMINATION

17 BY MR. SCHONMAN:

18 Q Mrs. Duff, I'd like to direct your attention to  
19 Glendale Exhibit No. 211 and that -- it's a five page  
20 document. Each, each one of the pages is an Absence Report.  
21 I'm not sure it will be in the binder.

22 MR. TOPEL: It's not going to be in that binder. Do  
23 you still have it up there?

24 MRS. DUFF: Oh, no. I think it fell on the floor.

25 BY MR. SCHONMAN:

1 Q Mrs. Duff, do you have that, that document?

2 A Yes.

3 Q Now, this is an Absence Report from March 13, 1992?

4 Correct?

5 A Yes.

6 Q In March of 1992 what position did Al Brown hold at

7 TBN?

8 A He was Director of Finance and he was also overall  
9 responsible for the oversight of the Personnel Department.

10 Q Was he also Chief of Staff?

11 A I'm not positive if that was his exact title.

12 Q Now, yesterday in response to a question from Mr.  
13 Topel you testified that Mr. Brown was not responsible for  
14 overseeing your work.

15 A No.

16 Q My question is did Mr. Brown have any responsibility  
17 for overseeing Absence Reports and leave of TBN employees?

18 A He was the recorder basically. It was his overall  
19 responsibility to supervise that area, yes.

20 Q Thank you. I'd like to turn to TBF Exhibit 199 which  
21 is in a blue binder.

22 JUDGE CHACHKIN: No, that's not the one. That's --  
23 one is the exhibit which was offered by Mr. Topel.

24 MRS. DUFF: Oh.

25 JUDGE CHACHKIN: The witness has it.

1 MR. SCHONMAN: Thank you.

2 BY MR. SCHONMAN:

3 Q Mrs. Duff, can you turn to page 1 of that exhibit?  
4 That's a purchase order and I have a question similar to those  
5 Mr. Cohen asked. What are the authorized signatures on page  
6 1?

7 A Whose signature you mean?

8 Q Yes.

9 A Al Brown and mine.

10 Q Now, on page 2 it indicates it was an order placed  
11 by you and George Sebastian. Can you tell me what, what Mr.  
12 Sebastian's role was with respect to this document?

13 A Let's see. Mr. Sebastian was asked to go to Odessa  
14 for me and locate a site and he was the, the contact person  
15 with the site -- with the landowner. In other words, he put  
16 the two of us together and so that's why the order was  
17 reference his name.

18 Q Can we turn to page 93 of this exhibit and this  
19 appears to be a check made out to Trinity Broadcasting on an  
20 account -- on an NMTV account in an amount in excess of  
21 \$8,000. Do you recall what the purpose this check was?

22 A Well, so much of it is obliterated. No, I don't  
23 just remember. I can't tell what it was.

24 Q Do you have any recollection as to why NMTV made a  
25 -- made out a check to Trinity in excess of \$8,000 in December

1 1989?

2 A It may have been a payment. I -- I'm not sure what  
3 it would have been in '89.

4 JUDGE CHACHKIN: Does it help if you looked at To  
5 The Order Of MISC? What does that stand for?

6 MRS. DUFF: Miscellaneous.

7 JUDGE CHACHKIN: Does that assist you in --

8 MRS. DUFF: No, it doesn't.

9 BY MR. SCHONMAN:

10 Q Mrs. Duff, I'm curious about something on page 99.  
11 Perhaps you can help me out. This appears to be a check of  
12 almost \$5,000 made out to Steve Thomas Antiques. Do you  
13 recall what that was for?

14 A Yes. That's for -- let's see. What date is that?

15 Q November 1989.

16 A Right. That would be for furniture for the, the  
17 studio. This was an order placed for furnishings for the  
18 studio in Portland.

19 Q We can turn to Bureau Exhibit No. 273 and that's in  
20 Volume 5.

21 A 273?

22 Q Correct. Page 2 of Exhibit 273, and that document  
23 is entitled Filled Position Report. Did you fill out this  
24 form or did Mark Fountain fill out this form?

25 A No, I filled out the form.

1           Q     It indicates on this page that Mark Fountain applied  
2 for a position with NMTV on August 14, 1989. Is that, in  
3 fact, the date that he applied?

4           A     No. That was the day I filled it. I don't know why  
5 that specific date, but I'd asked him just to fill out an  
6 application. It was probably the date of the application that  
7 he filled out. I'm not sure what that date means. I don't  
8 remember.

9           Q     Well, the application period indicates August 1,  
10 1989 and in the box to the right of that it says Date Prepared  
11 and that's left blank. Had you ever filled out any of these  
12 forms before?

13          A     Yes. Well, in fact, this is probably one of the  
14 first ones that I had used, not the very first one, but it  
15 was, it was probably close to the first one.

16          Q     Did you fill out any such forms with regards to  
17 hiring of positions for the Odessa station?

18          A     I don't think we had the forms then.

19          Q     Is this a TBN form?

20          A     It's a form that, that I adopted to use. I think I  
21 kind of designed it myself really.

22          Q     And Mark Fountain was the only individual who  
23 applied for the position of Chief Engineer at the Portland  
24 station?

25          A     Mark was somebody that I knew and trusted and I knew

1 had the ability to do what we needed to do, that -- what we  
2 had to deal with was the deadline to have a station built from  
3 the ground up. I needed somebody that could deliver, somebody  
4 that was going to be a long way away from where I was and  
5 somebody that I could trust, and I felt Mark was that person.

6 Q Well, that's not responsive to my question. My  
7 question was was Mr. Fountain the only individual who applied  
8 for the position of Chief Engineer?

9 A Yes, he was.

10 Q You received no resumes or responses from an ad  
11 placed in Broadcasting Magazine?

12 A No.

13 Q Did, in fact, you place an ad in Broadcasting  
14 Magazine?

15 A There was -- as far as I know I don't believe I put  
16 an ad in Broadcasting Magazine.

17 Q Why is it on this form then that you contacted  
18 Broadcasting Magazine as a recruitment source?

19 A Oh, there was a -- I think there was a standing ad,  
20 but I don't specifically remember putting an ad in.

21 Q What do you --

22 A Possibly Ben Miller might have put it in, but I  
23 don't have a, I don't have a specific memory of it.

24 Q Now, earlier, Mrs. Duff, you testified in response  
25 to a question from Mr. Topel that you were involved, actively

1 involved, in negotiating certain agreements on behalf of NMTV,  
2 the Tower Lease Agreement for Portland and other such  
3 agreements. Do you recall?

4 A Yes.

5 Q The activities that you carried on on behalf of  
6 NMTV, isn't it a fact that you carried out those activities  
7 during your TBN workday?

8 A That's true.

9 Q Mrs. Duff, we can move to Bureau Exhibit No. 336 and  
10 that's in, and that's in Volume 6 of the Bureau's exhibits.

11 A 336?

12 Q Yes. Actually 336 and also 350, Bureau Exhibit 350.  
13 Do you have those two documents?

14 A Yes.

15 Q Now, you were asked a few questions earlier this  
16 morning about the individuals who appear on the lists at the  
17 bottom of each document and Mr. Cohen went down the list with  
18 you. Why, why is Advanced Insurance on the list on Exhibit  
19 336?

20 A Advanced Insurance actually did not apply to each  
21 and every one, but this was just a standard list of -- to be  
22 copied. The only time that Advanced Insurance was actually  
23 notified was when I called them and they were, they were  
24 notified that it was a, a station that needed to be -- there  
25 needed to be a Certificate of Insurance or something of that



1 nature.

2 Q Insurance for what?

3 A For the liability insurance for the tower, depending  
4 on the type of lease that the -- you know, if, in fact, there  
5 was a request in the lease for a Certificate of Insurance.

6 Q Now, if we move to Bureau Exhibit No. 350 Advanced  
7 Insurance does not appear on the list of individuals who  
8 received a copy of this interoffice memo. The reason that  
9 you've just described to me, is that the reason why Advanced  
10 Insurance is not on the list on Exhibit 350?

11 A I don't know why it's on this. It's not on this  
12 list. It was usually standard.

13 Q For all stations, all low power stations?

14 A It -- well, it -- as far as I could see it was  
15 usually just the same list that appeared on each memo. It was  
16 a standard list to be copied -- for everybody to be copied.

17 Q Was there a standard list, and I -- when I say list,  
18 I mean a cc: list, for NMTV stations and a different standard  
19 list for other stations?

20 A Since I didn't originate this interoffice memo, I'm  
21 not sure.

22 Q Are you saying that you -- I'm trying to understand  
23 your testimony. Are you saying that you know of a list for  
24 NMTV's low power stations, but you're not familiar with a  
25 list, the cc: list, for other company's stations?

1           A     No. This memo would come out -- Mr. Sebastian did  
2 this interoffice memo and I didn't pay that much attention to  
3 who was copied, and he from time to time would drop something  
4 and -- or add something, you know, add somebody or drop it or  
5 somebody would make a request that wasn't on the list and they  
6 would ask to get a copy, so I didn't really focus that much  
7 on, on the lists themselves.

8           JUDGE CHACHKIN: But you wanted to know whether it  
9 was a separate entity? Isn't that what you asked, low power  
10 cases? Was there a separate entity?

11           MRS. DUFF: No. The lists were the same. They  
12 changed from time to time, but I don't think there was any  
13 difference between the two.

14           BY MR. SCHONMAN:

15           Q     Mrs. Duff, let's go to Volume 7 of the Bureau's  
16 exhibits, specifically Exhibit 403. Do you have that document  
17 before you?

18           A     Yes.

19           Q     Now, in response to a question earlier this morning  
20 you testified that there were some communities that NMTV would  
21 apply for and others that it wouldn't, and the ones that it  
22 wouldn't apply for was a function of whether the station would  
23 overlap with another TBN station?

24           A     There was another affiliate or --

25           Q     Can you -- I'd like to flush that out. Can you

1 explain fully this overlapping concern?

2       A     We just wanted to make sure that the contours did  
3 not overlap because in the case of a TBN station and an  
4 affiliate station we didn't want to have overlapping zip codes  
5 basically, and we had maps drawn that identified the station's  
6 contours based on their coordinates and within that circle we  
7 would place zip codes and the donations that came in to TBN  
8 from the specific area they were identified. Those donations  
9 were identified by the zip code. So, therefore, we paid our  
10 affiliates based on these zip codes so, therefore, we didn't  
11 want to have overlapping contours. That meant that we would  
12 have a problem trying to determine who was to be paid and how  
13 much.

14       Q     So if I understand your testimony, NMTV would not  
15 apply for or construct a station in a location where there  
16 would be another Trinity station?

17       A     Right.

18       Q     Did the contours for NMTV's low power station in  
19 Houston in any way overlap with CET's full power station in  
20 Houston?

21       A     Yes. There was, there was overlapping there.

22       Q     And wasn't the low power station that was held by  
23 NMTV fully encompassed by the signal put out by CET's full  
24 power station in Houston?

25       A     Yes, it would have been.

1           Q     Isn't it a fact that that's the reason that NMTV did  
2 not even attempt to construct its Houston low power station?

3           A     No. That situation was, was very unique in that it  
4 would have been -- the income would have been enhanced and the  
5 -- there would be a way of -- there would have, there would  
6 have been a way of working it out. But the major reason why,  
7 as I explained, I just didn't have time to build that station.  
8 It was -- I had other things that were far more important at  
9 that particular time.

10          Q     Mrs. Duff, you've just testified that NMTV would not  
11 apply for or construct a station where the signal of that  
12 station would be encompassed or overlap with another TBN  
13 station and we have a situation in Houston where that, in  
14 fact, was the case and you're saying that was not a concern as  
15 to why NMTV did not construct its low power station in  
16 Houston?

17          A     Okay. We're talking about two time frames. That  
18 was back in -- early on. That was like in -- I'm sorry, '87,  
19 '88. This memo that refers to not drawing those -- you know,  
20 not having the stations overlapping, that was long after. We  
21 ran into problems with that more recently. In other words,  
22 that -- this type of thing wasn't even being considered back  
23 when that Houston station was granted because we didn't have  
24 that many stations. We didn't realize it was going to be a  
25 problem. This is something that is more recent. We didn't

1 run into this overlapping situation until there were many,  
2 many stations. And I had situations where we did have  
3 stations that did have overlapping contours and we worked it  
4 out, but it was a problem and I didn't want to deal with that  
5 anymore. I had a situation in San Jose and Concord where we  
6 had two affiliates that had overlapping contours and we had a  
7 shared portion in the middle that we did do that, but it  
8 created more work for me to have to, to decide what part was  
9 going to be shared, what part was going to be given to one  
10 affiliate and what was going to be given to another. But this  
11 was later on that we developed this policy. But back when we  
12 had that station in Houston we hadn't even really thought that  
13 through.

14 Q But in Houston we're not talking about just mere  
15 overlap. We're talking about an NMTV station which would have  
16 been totally encompassed by CET's full power station. You're  
17 telling me that that played no role in your decision not to  
18 construct the low power station?

19 A Well, it would have. The basic thing that Mr.  
20 Crouch -- the thing that he wanted to do was to be able to  
21 have a TBN telethon in an area that he would not be able to  
22 have a TBN telethon because the telethons for the educational  
23 stations were very limited. You could only raise money for  
24 the educational station there. He -- but if he had another  
25 outlet that meant that he could raise funds for any TBN

1 project that he wanted to, but he was limited with that  
2 educational channel to raise funds for the educational  
3 stations, and so that was the reason why he was wanting to  
4 have that station built. But, frankly, I just did not have  
5 time to build it. I mean, it's just simple. I hadn't thought  
6 it through. I just said, "I am too busy," and that's the way  
7 I made the decision.

8 MR. SCHONMAN: I don't have any further questions,  
9 Your Honor.

10 JUDGE CHACHKIN: Is there any further recross?

11 MR. TOPEL: No, Your Honor.

12 JUDGE CHACHKIN: You're excused. Thank you.

13 (Whereupon, the witness was excused.)

14 JUDGE CHACHKIN: We can take about a ten minute  
15 recess now before we have the next witness rather than waiting  
16 until ten minutes, so why don't we take it now?

17 (Off the record.)

18 JUDGE CHACHKIN: Back on the record. Mr. Topel?

19 MR. TOPEL: Yes, Your Honor. I call to the witness  
20 stand Dr. Paul Crouch.

21 Whereupon,

22 PAUL F. CROUCH

23 was called as a witness and, after having first been duly  
24 sworn, was examined and testified as follows:

25 DIRECT EXAMINATION

1 BY MR. TOPEL:

2 Q Sir, would you please state your full name for the  
3 record?

4 A Paul F. Crouch, C-R-O-U-C-H.

5 Q And what is your residence address?

6 A 1973 Port Chelsea, two words, Port, P-O-R-T,  
7 C-H-E-L-S-E-A, Newport Beach, California.

8 Q Thank you. Dr. Crouch, I'm showing you a document  
9 that has been received into evidence in this proceeding as  
10 Trinity Broadcasting of Florida Exhibit 104.

11 MR. TOPEL: Your Honor, it's in Volume 2-B. It's a  
12 fairly thin volume that has 102, 103 and 104 in it.

13 JUDGE CHACHKIN: Go ahead.

14 MR. TOPEL: Okay.

15 BY MR. TOPEL:

16 Q And, Dr. Crouch, I'm directing your attention to the  
17 supporting declaration that appears after page 23 of the  
18 testimony, and can you tell me is that your signature on that  
19 supporting declaration?

20 A Yes, it is.

21 Q And does this document constitute your direct  
22 testimony in this FCC proceeding?

23 A Yes, sir.

24 MR. TOPEL: Your Honor, I believe the witness is  
25 available for cross-examination.

1 JUDGE CHACHKIN: Mr. Cohen?

2 MR. COHEN: Thank you, Your Honor.

3 CROSS-EXAMINATION

4 BY MR. COHEN:

5 Q Good morning, Dr. Crouch.

6 A Good morning, Lew.

7 Q Sir, you are aware, I'm sure, because Mr. Topel has  
8 told you about the sequestration rule that we have in this  
9 proceeding. You're familiar with that, I take it?

10 A Yes.

11 Q Okay. And am I correct that you have no knowledge  
12 of any of the testimony of Pastor Hill or Mrs. Duff?

13 A I do not.

14 Q And you have no knowledge of the questions that were  
15 put to them or their answers?

16 A No, sir.

17 Q You, of course, are aware of depositions in this  
18 proceeding inasmuch as your deposition was taken. Have you  
19 had occasion -- I take it you've had occasion to review your  
20 own deposition, of course?

21 A Yes, sir.

22 Q Have you had occasion to review the depositions of  
23 any of the other NMTV and Trinity witnesses whose depositions  
24 were taken?

25 A No.



1 Q Now, if I could, I want to bring you back to the  
2 origin of Translator Television, Inc., and I wonder if Mr.  
3 Topel would put before the witness the Articles of  
4 Incorporation of Translator Television, Inc. which --

5 MR. TOPEL: Do you have the document number?

6 MR. COHEN: Yes, I do. It would be Bureau Exhibit  
7 7.

8 BY MR. COHEN:

9 Q Dr. Crouch, spend as much time as you need to  
10 familiarize yourself with those Articles which were signed by  
11 you, sir, on, on September 15, 1980, and tell me when you've  
12 had a chance to read them.

13 A I've generally reviewed them, Mr. Cohen.

14 Q Now, this is not the first time that you've seen  
15 these Articles, of course? Am I correct?

16 A That's correct.

17 Q And bringing you back to 1980, do you have a  
18 recollection of reviewing these Articles or reading these  
19 Articles of Incorporation before you signed them?

20 A I'm sure I did, sir. I have no independent  
21 recollection of that.

22 Q But that would have been your, your normal course of  
23 action? Correct?

24 A Generally speaking, yes, sir.

25 Q You don't sign documents of this nature without

1 reading them, do you?

2 A Certainly not always.

3 Q Did the -- I want to bring you back to 1980. Did  
4 the Articles accurately reflect the purposes of Translator  
5 T.V., Inc.?

6 A Generally speaking, I believe they, they do.

7 Q They did then and they do now?

8 A I believe so, sir.

9 Q Help me for a minute. What is the name of the  
10 parent Trinity corporation?

11 A Today it is Trinity Christian Center of Santa Anna,  
12 Inc.

13 Q Now, does that -- that corporation is, of course, a  
14 -- also a religious corporation as that term is defined in the  
15 California law? Correct?

16 A Yes.

17 Q And does that corporation have the same religious  
18 purposes that Translator T.V., Inc. has?

19 A They would be very similar.

20 Q Do you know of your own -- I know you're relying on  
21 your recollection, but do you know of your own recollection  
22 whether the purposes are, are different at all?

23 A There might be some individual articles that are not  
24 identical but, as I said, I think generally speaking the  
25 religious purpose of both corporations would be similar.

1 Q And how would you describe the religious purpose of  
2 both corporations?

3 A Basically to fulfill the great commission as  
4 outlined in Holy scripture to go into all the world and preach  
5 the gospel to every creature.

6 Q Thank you. And that would apply to Translator  
7 Television, Inc. as well as to the Trinity Center? Correct?

8 A It may not be quite as fully delineated in the  
9 Translator T.V., Inc. constitution as it is in the Trinity  
10 Christian Center constitution.

11 Q But the, but the substance would be the same?

12 A In essence, yes, sir.

13 Q Now, again bringing you back to 1980, you will  
14 recall that the -- from those Articles of Incorporation that  
15 Translator Television, Inc. was organized back in 1980. You  
16 have a recollection of that, I take it?

17 A I do now, sir.

18 Q Now, at that time you knew David Espinoza? Correct?

19 A Yes, sir.

20 Q And you knew him because he had been a, a programmer  
21 on TBN?

22 A Yes.

23 Q And isn't it true, Dr. Crouch, that Pastor Espinoza  
24 -- strike that. You were the one, am I correct, that  
25 approached Dr. -- I mean Pastor Espinoza to ask him to join

1 | Translator T.V., Inc. as a director?

2 |       A     Yes, sir. I believe I was the initial contact to  
3 | invite him to serve on the Board, yes, sir.

4 |       Q     That's what I thought. And isn't it true that  
5 | Pastor Espinoza told you before he was elected a director and  
6 | an officer that he wanted to help NMTV or its predecessor, but  
7 | that his first priority was to his church?

8 |       A     I do not remember any particular statement like  
9 | that, sir, no.

10 |       Q     Now, isn't it true, Dr. Crouch, that Pastor Espinoza  
11 | carried out his duties of being Chief Financial Officer pretty  
12 | much in name and title only?

13 |       A     I think in those early start-up years of Translator  
14 | T.V., Inc. there was, as I've said so often, virtually no  
15 | activity whatsoever, so in a sense I don't think anybody could  
16 | have carried out those duties. There weren't any duties. It  
17 | was pretty much a shell corporation for the first several  
18 | years of its existence. But specifically to answer that  
19 | question, the answer would be yes, sir.

20 |       Q     Well, insofar as what the corporation did back in  
21 | 1980 --

22 |             MR. COHEN: Strike that, Your Honor. I want to ask  
23 | a different question.

24 |             BY MR. COHEN:

25 |       Q     I want to ask you about a gentleman named Phipps.

1 Do you recall Mr. Phipps? He was Director of Finance for TBN?

2 A Yes, I remember him.

3 Q And back in 1981 am I correct that he was wearing  
4 also a Television Translator, Inc. hat?

5 A I suppose to the extent that he was representing  
6 Trinity and Trinity was providing certain financial services  
7 to Translator T.V., Inc. at that time, I suppose that is a  
8 fair characterization, yes, sir.

9 Q Well, would you look at Mass Media Bureau Exhibit  
10 29.

11 MR. COHEN: Mr. Topel, can you explain --

12 MR. TOPEL: I tried to --

13 MR. COHEN: Try to explain.

14 MR. TOPEL: I tried to explain. Mr. Crouch, that's  
15 in the volume that you have.

16 DR. CROUCH: Okay.

17 MR. TOPEL: Now, what was it again, Mr. Cohen?  
18 Exhibit 29, did you say?

19 MR. COHEN: It's --

20 JUDGE CHACHKIN: 29.

21 DR. CROUCH: 29.

22 BY MR. COHEN:

23 Q You'll note, Dr. Crouch -- tell me when you've found  
24 it.

25 A The February 18, '81?

1 Q Correct. You have it, yes.

2 A Yes.

3 Q You'll note that that document is on the letterhead,  
4 if you will, of Translator T.V., Inc. and it's signed by Mr.  
5 Phipps as Director of Finance?

6 A Yes.

7 Q Now, he wasn't paid any compensation, was he, by  
8 Translator T.V., Inc.?

9 A Not to my knowledge.

10 Q So in preparing that document on behalf of  
11 Translator T.V., Inc., he was carrying out his -- part of his  
12 regular duties at Trinity? Correct?

13 A Yes.

14 Q Now, am I correct -- I have nothing else on that  
15 document, Dr. Crouch. Am I correct that it was Mr. Juggert's  
16 practice, Norman Juggert who's been identified in this record,  
17 Mr. Juggert's practice or Mrs. Duff's practice to send you  
18 copies of the minutes of Television Translator, Inc. or NMTV  
19 for your review before they were signed by either Mrs. Duff or  
20 Mr. Juggert?

21 A I believe on some occasions they were, but on some  
22 occasions I, I do not believe they were.

23 Q And what I'd like you to do is look at Exhibit --  
24 Bureau Exhibit 377, if you would.

25 MR. TOPEL: That's going to be -- Dr. Crouch, that

1 will be in Volume 6 which is to your left in that chair.

2 BY MR. COHEN:

3 Q Tell me when you've found that document.

4 A October 2, 1991 Special Meeting?

5 Q Correct. And you see that -- there's a notation in  
6 your handwriting on the right side of the page?

7 MR. TOPEL: Direct him to the page, Mr. Cohen. The  
8 exhibit has multiple pages.

9 MR. COHEN: I'm going to find it. I was going --

10 MR. TOPEL: Page 2.

11 BY MR. COHEN:

12 Q Dr. Crouch, page 2.

13 A Yes. I -- I'm there now.

14 Q Okay. And that's your handwriting, isn't it?

15 A Yes, it is.

16 Q And is that an illustration of an incident where you  
17 received the minutes for your review and you made a notation?  
18 Is that correct?

19 A In this case that would be true.

20 Q And why did you want to be sure that Colby -- by the  
21 way, that's Colby May? Correct?

22 A Yes,

23 Q Why was it important that Colby May get a copy of  
24 those minutes?

25 A Because he was in effect representing TTI as well as

1 Trinity Broadcasting.

2 Q And was it the practice of, of Television  
3 Translator, Inc. and NMTV to send Mr. May copies of all of the  
4 minutes?

5 A I don't believe it was the practice to send all of  
6 the minutes. I believe that minutes that were particularly  
7 important in the director's or officer's mind may have been  
8 forwarded on to Mr. May, and this apparently was one of them.

9 Q And did that procedure pertain for both Translator  
10 Television, Inc., NMTV and Trinity?

11 A I have no independent knowledge that, you know,  
12 minutes other than this one were forwarded on to Mr. May.

13 Q Now, when Mr. Phipps left a gentleman named Pasorius  
14 proceeded him? Correct?

15 A Casoria.

16 Q Would you spell that for the record?

17 A C-A-S-O-R-I-A, Mr. John Casoria.

18 Q And he then served in the same capacity as Mr.  
19 Phipps had done -- had? Correct?

20 A In essence, yes.

21 Q And he provided whatever financial services that  
22 Translator Television, Inc. required? They were then provided  
23 by Mr. Casoria? Correct?

24 A They were probably overseen by him.

25 Q Now, I want you to look at Bureau Exhibit 125,



1 | please, sir.

2 |           MR. TOPEL: That's in Volume 3.

3 |           DR. CROUCH: Action by written consent?

4 |           BY MR. COHEN:

5 |       Q     Yes.

6 |       A     Yes.

7 |       Q     Read that to yourself. Then tell me when you've

8 | read it. I'm going to be asking you only about the paragraph

9 | that begins, "Resolve further," not the first paragraph.

10 |      A     Okay.

11 |      Q     And tell me when you've read it.

12 |      A     I'm there, sir.

13 |      Q     And it's a fair statement, isn't it, that the, the

14 | Action by Written Consent memorializes in writing what had

15 | been a practice and a procedure of Translator Television,

16 | Inc.?

17 |      A     On certain occasions, yes, sir.

18 |      Q     On certain occasions? Well, you say on certain

19 | occasions. What -- on what occasion would not -- strike that.

20 | On what occasion did -- on what occasions was the, the

21 | practice that's described in this Action by Written Consent

22 | not carried out prior to January 26, 1987?

23 |      A     I'm sorry, Mr. Cohen. I don't think I understand

24 | the question.

25 |      Q     Well, I asked you whether this document memorializes